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21 Attorneys for Plaintiff  
22 UNITED STATES OF AMERICA

23 UNITED STATES DISTRICT COURT  
24 FOR THE CENTRAL DISTRICT OF CALIFORNIA

25 UNITED STATES OF AMERICA,

No. 2:23-CR-00596-RGK-2

26 Plaintiff,

PLEA AGREEMENT FOR DEFENDANT  
JOSEPH WONG

27 v.

28 JOSEPH WONG,

Defendant.

29  
30 1. This constitutes the plea agreement between JOSEPH WONG  
31 ("defendant") and the United States Attorney's Office for the Central  
32 District of California (the "USAO") and the United States Department  
33 of Justice, Computer Crime and Intellectual Property Section ("CCIPS")  
34 and together with the USAO, the "United States") in the above-  
35 captioned case. This agreement is limited to the USAO and CCIPS and  
36 cannot bind any other federal, state, local, or foreign prosecuting,  
37 enforcement, administrative, or regulatory authorities.  
38

1   DEFENDANT'S OBLIGATIONS

2       2. Defendant agrees to:

3   a. At the earliest opportunity requested by the United  
4 States and provided by the Court, appear and plead guilty to count  
5 one of the indictment in United States v. Lu Zhang et al., CR No. 23-  
6 596-RGK, which charges defendant with conspiracy to commit money  
7 laundering, in violation of 18 U.S.C. § 1956(h).

8   b. Not contest facts agreed to in this agreement.

9   c. Abide by all agreements regarding sentencing contained  
10 in this agreement.

11   d. Appear for all court appearances, surrender as ordered  
12 for service of sentence, obey all conditions of any bond, and obey  
13 any other ongoing court order in this matter.

14   e. Not commit any crime; however, offenses that would be  
15 excluded for sentencing purposes under United States Sentencing  
16 Guidelines ("U.S.S.G." or "Sentencing Guidelines") § 4A1.2(c) are not  
17 within the scope of this agreement.

18   f. Be truthful at all times with the United States  
19 Probation and Pretrial Services Office and the Court.

20   g. Pay the applicable special assessment at or before the  
21 time of sentencing unless defendant has demonstrated a lack of  
22 ability to pay such assessments.

23   h. Defendant agrees that any and all criminal debt  
24 ordered by the Court will be due in full and immediately. The  
25 government is not precluded from pursuing, in excess of any payment  
26 schedule set by the Court, any and all available remedies by which to  
27 satisfy defendant's payment of the full financial obligation,  
28 including referral to the Treasury Offset Program.

1           i.    Complete the Financial Disclosure Statement on a form  
2 provided by the USAO and, within 30 days of defendant's entry of a  
3 guilty plea, deliver the signed and dated statement, along with all  
4 of the documents requested therein, to the USAO by either email at  
5 usacac.FinLit@usdoj.gov (preferred) or mail to the USAO Financial  
6 Litigation Section at 300 North Los Angeles Street, Suite 7516, Los  
7 Angeles, CA 90012. Defendant agrees that defendant's ability to pay  
8 criminal debt shall be assessed based on the completed Financial  
9 Disclosure Statement and all required supporting documents, as well  
10 as other relevant information relating to ability to pay.

11                   j. Authorize the USAO to obtain a credit report upon  
12 returning a signed copy of this plea agreement.

13                   k.     Consent to the USAO inspecting and copying all of  
14 defendant's financial documents and financial information held by the  
15 United States Probation and Pretrial Services Office.

## THE UNITED STATES' OBLIGATIONS

17       3. The United States agrees to:

18 a. Not contest facts agreed to in this agreement.

19                   b.     Abide by all agreements regarding sentencing contained  
20 in this agreement.

21                   c. At the time of sentencing, move to dismiss the  
22 remaining counts of the indictment as against defendant. Defendant  
23 agrees, however, that at the time of sentencing the Court may  
24 consider any dismissed charges in determining the applicable  
25 Sentencing Guidelines range, the propriety and extent of any  
26 departure from that range, and the sentence to be imposed.

27                   d. At the time of sentencing, provided that defendant  
28 demonstrates an acceptance of responsibility for the offense up to

1 and including the time of sentencing, recommend a two-level reduction  
2 in the applicable Sentencing Guidelines offense level, pursuant to  
3 U.S.S.G. § 3E1.1, and recommend and, if necessary, move for an  
4 additional one-level reduction if available under that section.

#### NATURE OF THE OFFENSE

4. Defendant understands that for defendant to be guilty of  
the crime charged in count one, that is, conspiracy to commit money  
laundering, in violation of Title 18, United States Code, Section  
1956(h), the following must be true: First, there was an agreement  
between two or more persons to engage in concealment money  
laundering, in violation of Title 18, United States Code, Section  
1956(a)(1)(B)(i); and second, defendant became a member of the  
conspiracy knowing of its object and intending to help accomplish it.  
The elements of concealment money laundering, are as follows: first,  
defendant conducted or intended to conduct a financial transaction  
involving property that represented the proceeds of wire fraud, in  
violation of Title 18, United States Code, Section 1343; second,  
defendant knew that the property represented the proceeds of some  
form of unlawful activity; and third, defendant knew that the  
transaction was designed in whole or in part to conceal or disguise  
the nature, location, source, ownership, and control of the proceeds.

## PENALTIES AND RESTITUTION

23       5. Defendant understands that the statutory maximum sentence  
24 that the Court can impose for a violation of Title 18, United States  
25 Code, Section 1956(h), is: 20 years' imprisonment; a three-year  
26 period of supervised release; a fine of \$500,000 or twice the gross  
27 gain or gross loss resulting from the offense, whichever is greatest;  
28 and a mandatory special assessment of \$100.

1       6. Defendant understands that defendant will be required to  
2 pay full restitution to the victims of the offense to which defendant  
3 is pleading guilty. Defendant agrees that, in return for the United  
4 States' compliance with its obligations under this agreement, the  
5 Court may order restitution to persons other than the victims of the  
6 offense to which defendant is pleading guilty and in amounts greater  
7 than those alleged in the count to which defendant is pleading  
8 guilty. In particular, defendant agrees that the Court may order  
9 restitution to any victim of any of the following for any losses  
10 suffered by that victim as a result: any relevant conduct, as defined  
11 in U.S.S.G. § 1B1.3, in connection with the offenses to which  
12 defendant is pleading guilty. The applicable amount of restitution  
13 is at least \$7,560,014. The parties agree that the amount of  
14 restitution could change based on facts that come to the attention of  
15 the parties prior to sentencing.

16       7. Defendant understands that supervised release is a period  
17 of time following imprisonment during which defendant will be subject  
18 to various restrictions and requirements. Defendant understands that  
19 if defendant violates one or more of the conditions of any supervised  
20 release imposed, defendant may be returned to prison for all or part  
21 of the term of supervised release authorized by statute for the  
22 offense that resulted in the term of supervised release, which could  
23 result in defendant serving a total term of imprisonment greater than  
24 the statutory maximum stated above.

25       8. Defendant understands that, by pleading guilty, defendant  
26 may be giving up valuable government benefits and valuable civic  
27 rights, such as the right to vote, the right to possess a firearm,  
28 the right to hold office, and the right to serve on a jury. Defendant

1 understands that he is pleading guilty to a felony and that it is a  
2 federal crime for a convicted felon to possess a firearm or  
3 ammunition. Defendant understands that the conviction in this case  
4 may also subject defendant to various other collateral consequences,  
5 including but not limited to revocation of probation, parole, or  
6 supervised release in another case and suspension or revocation of a  
7 professional license. Defendant understands that unanticipated  
8 collateral consequences will not serve as grounds to withdraw  
9 defendant's guilty plea.

10       9. Defendant and his counsel have discussed the fact that, and  
11 defendant understands that, if defendant is not a United States  
12 citizen, the conviction in this case makes it practically inevitable  
13 and a virtual certainty that defendant will be removed or deported  
14 from the United States. Defendant may also be denied United States  
15 citizenship and admission to the United States in the future.  
16 Defendant understands that while there may be arguments that  
17 defendant can raise in immigration proceedings to avoid or delay  
18 removal, removal is presumptively mandatory and a virtual certainty  
19 in this case. Defendant further understands that removal and  
20 immigration consequences are the subject of a separate proceeding and  
21 that no one, including his attorney or the Court, can predict to an  
22 absolute certainty the effect of his conviction on his immigration  
23 status. Defendant nevertheless affirms that he wants to plead guilty  
24 regardless of any immigration consequences that his plea may entail,  
25 even if the consequence is automatic removal from the United States.

## FACTUAL BASIS

27        10. Defendant admits that defendant is, in fact, guilty of the  
28 offense to which defendant is agreeing to plead guilty. Defendant

1 and the United States agree to the statement of facts provided below  
2 and agree that this statement of facts is sufficient to support a  
3 plea of guilty to the charge described in this agreement and to  
4 establish the Sentencing Guidelines factors set forth in paragraph 12  
5 below but is not meant to be a complete recitation of all facts  
6 relevant to the underlying criminal conduct or all facts known to  
7 either party that relate to that conduct.

8 Beginning from at least September 2022, and continuing through  
9 at least March 21, 2023, in Los Angeles County, within the Central  
10 District of California, and elsewhere, defendant knowingly conspired  
11 with LU ZHANG, JUSTIN WALKER, and HAILONG ZHU, and others, to conduct  
12 financial transactions involving property that represented the  
13 proceeds of wire fraud, in violation of Title 18, United States Code,  
14 Section 1343. Defendant became a member of the conspiracy knowing of  
15 at least one of its objects and intending to help accomplish it.

16 Defendant admits that he conspired with ZHANG, WALKER, and ZHU  
17 to launder funds obtained from victims through cryptocurrency scams  
18 and related frauds, as described in count one of the indictment, and  
19 admits that the factual allegations described in count one are true  
20 and accurate. Defendant knew that the property involved in the  
21 financial transactions represented, and would represent, the proceeds  
22 of some form of unlawful activity; that the transactions were, and  
23 would be, designed in whole or in part to conceal or disguise the  
24 nature, location, source, ownership, and control of the proceeds; and  
25 that defendant and codefendants laundered at least \$20 million in  
26 fraudulently obtained funds.

27 In furtherance of the conspiracy, defendant managed a network of  
28 money launderers within Los Angeles County, and elsewhere. Defendant

1 communicated with his co-conspirators and coordinated acts in  
2 furtherance of the conspiracy through an encrypted messaging service.  
3 In order to conceal or disguise the nature, location, source,  
4 ownership, and control of the fraudulently obtained victim funds,  
5 defendant and ZHANG, WALKER, and ZHU received victim funds in bank  
6 accounts established on behalf of shell companies and caused the  
7 further transfer of victim funds to domestic and international bank  
8 accounts. Defendant and other co-conspirators also registered shell  
9 companies with the California Secretary of State, including Sea  
10 Dragon Trading and Sea Dragon Remodel and opened bank accounts in the  
11 names of various shell companies, including Sea Dragon Trading and  
12 Sea Dragon Remodel, with United States financial institutions.  
13 Defendant and other co-conspirators arranged for the transfer of the  
14 fraudulently obtained proceeds via interstate and international wire  
15 transfers.

16 Defendant and other co-conspirators traveled to financial  
17 institutions within the Central District of California and elsewhere  
18 to access funds in the bank accounts used to launder fraud proceeds.  
19 Defendant also controlled online access to accounts at United States  
20 financial institutions that were used to launder fraud proceeds.  
21 Defendant made phone calls to these financial institutions and  
22 falsely represented that he was the accountholder when, in fact,  
23 another co-conspirator was the accountholder. During these calls,  
24 defendant and others tried to unfreeze accounts that banks had  
25 restricted due to fraud concerns.

26 Defendant admits that at least \$20 million in victim funds were  
27 directly deposited into bank accounts associated with defendant and  
28 his co-conspirators, and more than \$2.2 million in victim funds were

1 directly deposited into bank accounts associated with the Sea Dragon  
2 shell entities.

3 SENTENCING FACTORS

4 11. Defendant understands that in determining defendant's  
5 sentence the Court is required to calculate the applicable Sentencing  
6 Guidelines range and to consider that range, possible departures  
7 under the Sentencing Guidelines, and the other sentencing factors set  
8 forth in 18 U.S.C. § 3553(a). Defendant understands that the  
9 Sentencing Guidelines are advisory only, that defendant cannot have  
10 any expectation of receiving a sentence within the calculated  
11 Sentencing Guidelines range, and that after considering the  
12 Sentencing Guidelines and the other § 3553(a) factors, the Court will  
13 be free to exercise its discretion to impose any sentence it finds  
14 appropriate up to the maximum set by statute for the crime of  
15 conviction.

16 12. Defendant and the United States agree to the following  
17 applicable Sentencing Guidelines factors:

18 Base Offense Level:	8	U.S.S.G. § 2S1.1(a)(2)
		U.S.S.G. § 2X1.1(a)
19 Laundered Funds Between More Than \$1,500,000 and More Than \$25,000,000	+16 to +22	U.S.S.G. § 2B1.1(b)(1)(I) U.S.S.G. § 2B1.1(b)(1)(L)
20 Conviction Under § 1956	+2	U.S.S.G. § 2S1.1(b)(2)(B)
21 Sophisticated Money Laundering	+2	U.S.S.G. § 2S1.1(b)(3)

22  
23  
24  
25 Defendant and the United States reserve the right to argue that  
26 additional specific offense characteristics, adjustments, and  
27 departures under the Sentencing Guidelines are appropriate, including  
28 the application of U.S.S.G. § 3B1.1(a). Specifically, the government

1 reserves the right to argue that defendant should receive up to a 22-  
2 level enhancement for laundered funds exceeding \$25,000,000, under  
3 U.S.S.G. § 2B1.1(b)(1)(L), and defendant reserves the right to argue  
4 that defendant should receive no more than a 16-level enhancement for  
5 laundered funds exceeding \$1,500,000, under U.S.S.G.  
6 § 2B1.1(b)(1)(I).

7       13. Defendant understands that there is no agreement as to  
8 defendant's criminal history or criminal history category.

9       14. Defendant and the United States reserve the right to argue  
10 for a sentence outside the sentencing range established by the  
11 Sentencing Guidelines based on the factors set forth in 18 U.S.C.  
12 § 3553(a)(1), (a)(2), (a)(3), (a)(6), and (a)(7).

## WAIVER OF CONSTITUTIONAL RIGHTS

14           15. Defendant understands that by pleading guilty, defendant  
15 gives up the following rights:

- a. The right to persist in a plea of not guilty.
  - b. The right to a speedy and public trial by jury.

18 c. The right to be represented by counsel -- and if  
19 necessary have the Court appoint counsel -- at trial. Defendant  
20 understands, however, that, defendant retains the right to be  
21 represented by counsel -- and if necessary have the Court appoint  
22 counsel -- at every other stage of the proceeding.

23                   d. The right to be presumed innocent and to have the  
24 burden of proof placed on the government to prove defendant guilty  
25 beyond a reasonable doubt.

26                           e. The right to confront and cross-examine witnesses  
27 against defendant.

1                   f. The right to testify and to present evidence in  
2 opposition to the charges, including the right to compel the  
3 attendance of witnesses to testify.

4                   g. The right not to be compelled to testify, and, if  
5 defendant chose not to testify or present evidence, to have that  
6 choice not be used against defendant.

7                   h. Any and all rights to pursue any affirmative defenses,  
8 Fourth Amendment or Fifth Amendment claims, and other pretrial  
9 motions that have been filed or could be filed.

10                   WAIVER OF APPEAL OF CONVICTION

11                  16. Defendant understands that, with the exception of an appeal  
12 based on a claim that defendant's guilty plea was involuntary, by  
13 pleading guilty defendant is waiving and giving up any right to  
14 appeal defendant's conviction on the offense to which defendant is  
15 pleading guilty. Defendant understands that this waiver includes,  
16 but is not limited to, arguments that the statute to which defendant  
17 is pleading guilty is unconstitutional, and any and all claims that  
18 the statement of facts provided herein is insufficient to support  
19 defendant's plea of guilty.

20                   WAIVER OF APPEAL OF SENTENCE AND COLLATERAL ATTACK

21                  17. Defendant agrees that, provided the Court imposes a total  
22 term of imprisonment on all counts of conviction within or below the  
23 range corresponding with an offense level of 35 and the criminal  
24 history category calculated by the Court, defendant gives up the  
25 right to appeal all of the following: (a) the procedures and  
26 calculations used to determine and impose any portion of the  
27 sentence; (b) the term of imprisonment imposed by the Court; (c) the  
28 fine imposed by the Court, provided it is within the statutory

1 maximum; (d) to the extent permitted by law, the constitutionality or  
2 legality of defendant's sentence, provided it is within the statutory  
3 maximum; (e) the term of probation or supervised release imposed by  
4 the Court, provided it is within the statutory maximum; and (f) any  
5 of the following conditions of probation or supervised release  
6 imposed by the Court: the conditions set forth in Second Amended  
7 General Order 20-04 of this Court; the drug testing conditions  
8 mandated by 18 U.S.C. §§ 3563(a)(5) and 3583(d); and the alcohol and  
9 drug use conditions authorized by 18 U.S.C. § 3563(b)(7).

10       18. Defendant also gives up any right to bring a post-  
11 conviction collateral attack on the conviction or sentence, including  
12 any order of restitution, except a post-conviction collateral attack  
13 based on a claim of ineffective assistance of counsel, a claim of  
14 newly discovered evidence, or an explicitly retroactive change in the  
15 applicable Sentencing Guidelines, sentencing statutes, or statutes of  
16 conviction. Defendant understands that this waiver includes, but is  
17 not limited to, arguments that the statute to which defendant is  
18 pleading guilty is unconstitutional, and any and all claims that the  
19 statement of facts provided herein is insufficient to support  
20 defendant's plea of guilty.

21       19. The United States agrees that, provided (a) all portions of  
22 the sentence are at or below the statutory maximum specified above  
23 and (b) the Court imposes a term of imprisonment within or above the  
24 range corresponding with an offense level of 35 and the criminal  
25 history category calculated by the Court, the United States gives up  
26 its right to appeal any portion of the sentence with the exception  
27 that the United States reserves the right to appeal the amount of  
28 restitution ordered if that amount is less than \$7,560,014.

1                   RESULT OF WITHDRAWAL OF GUILTY PLEA

2       20. Defendant agrees that if, after entering a guilty plea  
3 pursuant to this agreement, defendant seeks to withdraw and succeeds  
4 in withdrawing defendant's guilty plea on any basis other than a  
5 claim and finding that entry into this plea agreement was  
6 involuntary, then (a) the United States will be relieved of all of  
7 its obligations under this agreement; and (b) should the United  
8 States choose to pursue any charge that was either dismissed or not  
9 filed as a result of this agreement, then (i) any applicable statute  
10 of limitations will be tolled between the date of defendant's signing  
11 of this agreement and the filing commencing any such action; and  
12 (ii) defendant waives and gives up all defenses based on the statute  
13 of limitations, any claim of pre-indictment delay, or any speedy  
14 trial claim with respect to any such action, except to the extent  
15 that such defenses existed as of the date of defendant's signing this  
16 agreement.

17                   RESULT OF VACATUR, REVERSAL OR SET-ASIDE

18       21. Defendant agrees that if the count of conviction is  
19 vacated, reversed, or set aside, both the USAO and defendant will be  
20 released from all their obligations under this agreement.

21                   EFFECTIVE DATE OF AGREEMENT

22       22. This agreement is effective upon signature and execution of  
23 all required certifications by defendant, defendant's counsel, and an  
24 Assistant United States Attorney.

25                   BREACH OF AGREEMENT

26       23. Defendant agrees that if defendant, at any time after the  
27 signature of this agreement and execution of all required  
28 certifications by defendant, defendant's counsel, and an Assistant

1 United States Attorney, knowingly violates or fails to perform any of  
2 defendant's obligations under this agreement ("a breach"), the United  
3 States may declare this agreement breached. All of defendant's  
4 obligations are material, a single breach of this agreement is  
5 sufficient for the United States to declare a breach, and defendant  
6 shall not be deemed to have cured a breach without the express  
7 agreement of the United States in writing. If the United States  
8 declares this agreement breached, and the Court finds such a breach  
9 to have occurred, then: (a) if defendant has previously entered a  
10 guilty plea pursuant to this agreement, defendant will not be able to  
11 withdraw the guilty plea, and (b) the United States will be relieved  
12 of all its obligations under this agreement.

13       24. Following the Court's finding of a knowing breach of this  
14 agreement by defendant, should the United States choose to pursue any  
15 charge that was either dismissed or not filed as a result of this  
16 agreement, then:

17           a. Defendant agrees that any applicable statute of  
18 limitations is tolled between the date of defendant's signing of this  
19 agreement and the filing commencing any such action.

20           b. Defendant waives and gives up all defenses based on  
21 the statute of limitations, any claim of pre-indictment delay, or any  
22 speedy trial claim with respect to any such action, except to the  
23 extent that such defenses existed as of the date of defendant's  
24 signing this agreement.

25           c. Defendant agrees that: (i) any statements made by  
26 defendant, under oath, at the guilty plea hearing (if such a hearing  
27 occurred prior to the breach); (ii) the agreed to factual basis  
28 statement in this agreement; and (iii) any evidence derived from such

1 statements, shall be admissible against defendant in any such action  
2 against defendant, and defendant waives and gives up any claim under  
3 the United States Constitution, any statute, Rule 410 of the Federal  
4 Rules of Evidence, Rule 11(f) of the Federal Rules of Criminal  
5 Procedure, or any other federal rule, that the statements or any  
6 evidence derived from the statements should be suppressed or are  
7 inadmissible.

8 COURT AND UNITED STATES PROBATION AND PRETRIAL SERVICES

9 OFFICE NOT PARTIES

10 25. Defendant understands that the Court and the United States  
11 Probation and Pretrial Services Office are not parties to this  
12 agreement and need not accept any of the United States' sentencing  
13 recommendations or the parties' agreements to facts or sentencing  
14 factors.

15 26. Defendant understands that both defendant and the United  
16 States are free to: (a) supplement the facts by supplying relevant  
17 information to the United States Probation and Pretrial Services  
18 Office and the Court, (b) correct any and all factual misstatements  
19 relating to the Court's Sentencing Guidelines calculations and  
20 determination of sentence, and (c) argue on appeal and collateral  
21 review that the Court's Sentencing Guidelines calculations and the  
22 sentence it chooses to impose are not error, although each party  
23 agrees to maintain its view that the calculations in paragraph 12 are  
24 consistent with the facts of this case. While this paragraph permits  
25 both the United States and defendant to submit full and complete  
26 factual information to the United States Probation and Pretrial  
27 Services Office and the Court, even if that factual information may  
28 be viewed as inconsistent with the facts agreed to in this agreement,

1 this paragraph does not affect defendant's and the United States'  
2 obligations not to contest the facts agreed to in this agreement.

3        27. Defendant understands that even if the Court ignores any  
4 sentencing recommendation, finds facts or reaches conclusions  
5 different from those agreed to, and/or imposes any sentence up to the  
6 maximum established by statute, defendant cannot, for that reason,  
7 withdraw defendant's guilty plea, and defendant will remain bound to  
8 fulfill all defendant's obligations under this agreement. Defendant  
9 understands that no one -- not the prosecutor, defendant's attorney,  
10 or the Court -- can make a binding prediction or promise regarding  
11 the sentence defendant will receive, except that it will be within  
12 the statutory maximum.

**NO ADDITIONAL AGREEMENTS**

14           28. Defendant understands that, except as set forth herein,  
15 there are no promises, understandings, or agreements between the  
16 United States and defendant or defendant's attorney, and that no  
17 additional promise, understanding, or agreement may be entered into  
18 unless in a writing signed by all parties or on the record in court.

19 //

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1                   PLEA AGREEMENT PART OF THE GUILTY PLEA HEARING

2       29. The parties agree that this agreement will be considered  
3 part of the record of defendant's guilty plea hearing as if the  
4 entire agreement had been read into the record of the proceeding.

5 AGREED AND ACCEPTED

6 UNITED STATES ATTORNEY'S OFFICE  
7 FOR THE CENTRAL DISTRICT OF  
8 CALIFORNIA

9 JOSEPH T. McNALLY  
10 Acting United States Attorney



11 4/9/2025

12 Date

MAXWELL COLL  
NISHA CHANDRAN  
ALEXANDER S. GORIN  
Assistant United States Attorneys

13 STEFANIE SCHWARTZ  
14 TAMARA LIVSHIZ  
15 Trial Attorneys  
Criminal Division, Computer Crime  
and Intellectual Property Section



16 4/8/25

17 Date

JOSEPH WONG  
Defendant



18 04/08/2025

19 Date

JESSE RUIZ  
Attorney for Defendant JOSEPH WONG

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1                   CERTIFICATION OF DEFENDANT

2       I have read this agreement in its entirety. This agreement has  
3 been read to me in Mandarin, the language I understand best. I have  
4 had enough time to review and consider this agreement, and I have  
5 carefully and thoroughly discussed every part of it with my attorney.  
6 I understand the terms of this agreement, and I voluntarily agree to  
7 those terms. I have discussed the evidence with my attorney, and my  
8 attorney has advised me of my rights, of possible pretrial motions  
9 that might be filed, of possible defenses that might be asserted  
10 either prior to or at trial, of the sentencing factors set forth in  
11 18 U.S.C. § 3553(a), of relevant Sentencing Guidelines provisions,  
12 and of the consequences of entering into this agreement. No  
13 promises, inducements, or representations of any kind have been made  
14 to me other than those contained in this agreement. No one has  
15 threatened or forced me in any way to enter into this agreement. I  
16 am satisfied with the representation of my attorney in this matter,  
17 and I am pleading guilty because I am guilty of the charge and wish  
18 to take advantage of the promises set forth in this agreement, and  
19 not for any other reason.

20 

21 JOSEPH WONG  
Defendant

22   
Date

23  
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### CERTIFICATION OF INTERPRETER

I, Zhaohong Lu (320309), am fluent in the written and spoken English and Mandarin languages. I accurately translated this entire agreement from English into Mandarin to defendant JOSEPH WONG on this date.

date:  
Zhaohong Lu  
Zhaohong Lu (Apr 8, 2025 10:47 PDT)  
INTERPRETER

04/08/2025  
Date

CERTIFICATION OF DEFENDANT'S ATTORNEY

I am JOSEPH WONG's attorney. I have carefully and thoroughly discussed every part of this agreement with my client. Further, I have fully advised my client of his rights, of possible pretrial motions that might be filed, of possible defenses that might be asserted either prior to or at trial, of the sentencing factors set forth in 18 U.S.C. § 3553(a), of relevant Sentencing Guidelines provisions, and of the consequences of entering into this agreement. To my knowledge: no promises, inducements, or representations of any kind have been made to my client other than those contained in this agreement; no one has threatened or forced my client in any way to enter into this agreement; my client's decision to enter into this agreement is an informed and voluntary one; and the factual basis set forth in this agreement is sufficient to support my client's entry of a guilty plea pursuant to this agreement.

Jesse Ruiz  
JESSE RUIZ  
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